

WWR# 21339376

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:
Susan Muso

Debtor

Citizens Bank, N.A.

Movant

Case No. 16-13290-ref
Chapter 13

Hearing Date: 03/02/2017

Hearing Time: 09:30 am

REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to F.R.C.P. 34, Movant hereby requests that the Debtor produce for inspection by the undersigned attorney for the Movant the following:

1. If you deny any or all of the subsections under Movant's Request for admission No. 1:
 - (a) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payment due on 08/31/2016, was tendered to Movant.
 - (b) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payment due on 09/30/2016, was tendered to Movant.
 - (c) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payment due on 10/31/2016, was tendered to Movant.
 - (d) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payment due on 11/30/2016, was tendered to Movant.
 - (e) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payment due on 02/31/2016, was tendered to Movant.
 - (f) Canceled check, receipt, proof of money order, or other documentation evidencing that the post-petition payment due on 01/31/2017, was tendered to Movant.
2. Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Plaintiff's Request for Admission Number 1.

Respectfully Submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ Keri P. Ebeck
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